

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC.,
Plaintiff,

v.

MICHAEL K. YOUNG, IN HIS OFFICIAL
CAPACITY AS PRESIDENT OF TEXAS
A&M UNIVERSITY,
Defendant.

No. 4:18-CV-01547

JOINT STATUS REPORT AND
MOTION TO STAY DEADLINES

The Parties have reached an agreement in principle, and now present the following update and request to the Court:

1. Plaintiff filed its *Motion for Summary Judgment* on March 28, 2019. The current amended deadline for Defendant to respond is July 1, 2019.
2. Over the past several months, the Parties have engaged in productive informal settlement discussions. On June 12, 2019, and June 20, 2019, the Parties held telephone conferences related to the potential resolution of this litigation. The parties have now reached an agreement in principle to resolve this litigation.
3. The Parties require additional time to reduce this agreement into writing. Moreover, any settlement between the Parties must receive approval from the Office of the Attorney General of Texas before the settlement can take effect. Accordingly, the

parties request a 90-day stay of all deadlines in this case, including the deadline for Defendant to respond to Plaintiff's *Motion for Summary Judgment*, to allow the Parties time to draft and finalize a settlement agreement, and to ensure sufficient time for all required approvals. The Parties thus request that the Court stay all proceedings and reset Defendant's response deadline to October 1, 2019.

4. This Court should grant the requested stay and the extension request. This Court, like every federal court, has inherent authority to control its docket. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936) (referring to the power to stay proceedings as incident to inherent powers of federal courts); *see also In re Stone*, 986 F.3d 898, 902 (5th Cir. 1993) (concluding that federal courts have inherent authority "to protect the efficient and orderly administration of justice and those necessary to command respect for the court's orders, judgments, procedures, and authority."). Considering that settlement would resolve this dispute without need for further court intervention, the Parties agree that staying these proceedings and amending the deadlines as indicated above will save scarce judicial resource from being wasted.

CONCLUSION

This Court should grant the Parties' joint request for a continued stay of proceedings, so that they may reduce the agreement in principle to writing and resolve this case without further court intervention.

Dated: June 21, 2019.

Respectfully submitted,

/s/ David Greene (with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on this the 21st day of June, 2019, a true and correct copy of the foregoing was filed using the Court's CM/ECF system, causing electronic service upon all counsel of record.

/s/Eric A. Hudson
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